

**FEDERALLY ENFORCEABLE STATE  
OPERATING PERMIT (FESOP)  
and NEW SOURCE CONSTRUCTION PERMIT  
OFFICE OF AIR QUALITY**

**Fritz Enterprises, Inc.  
3210 Watling  
East Chicago, Indiana 46312**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: F089-14058-00465	
Issued by: Original signed by Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: August 6, 2001  Expiration Date: August 6, 2006

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## SECTION A

## SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

### A.1 General Information [326 IAC 2-8-3(b)]

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The Permittee owns and operates a stationary iron and steel recycling process.

Authorized individual:	David Splan
Source Address:	3210 Watling, East Chicago, IN 46312
Mailing Address:	1650 W. Jefferson, Trenton, Michigan 48183
General Source Phone Number:	(734) 362-3200
SIC Code:	5093
Source Location Status:	Lake
County Status:	Nonattainment for Ozone, PM <sub>10</sub> and SO <sub>2</sub> Attainment for all other criteria pollutants
Source Status:	Federally Enforceable State Operating Permit (FESOP) Minor Source, under Emission Offset Rules; Minor Source, Section 112 of the Clean Air Act

### A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

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This stationary source consists of the following emission units and pollution control devices:

- (a) One (1) diesel engine, identified as emission unit 3512, with a maximum capacity of 1019 HP and venting to stack SV001.
- (b) One (1) steel and iron sizing and classifying process consisting of:
  - (1) One (1) Hammer Mill with a maximum capacity of 75 tons per hour and venting to the atmosphere.
  - (2) One (1) iron and steel drop-balling process, with a maximum capacity of 112.5 tons per hour and venting to the atmosphere.
  - (3) One (1) Wash Screen with a maximum capacity of 75 tons per hour and venting to the atmosphere.
  - (4) Eight (8) conveyors with a maximum throughput of 112.5 tons per hour.
  - (5) Three (3) storage piles, identified as the feed storage pile, the non-magnetic material storage pile, and the magnetic material storage pile, each with a maximum capacity of 1000 tons and venting to the atmosphere.

### A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

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This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Categories with emissions below insignificant thresholds: one diesel storage tank, with a maximum capacity of 10,000 gallons.
- (b) Paved and unpaved roads and parking lots.

A.4 FESOP Applicability [326 IAC 2-8-2]

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This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) for a Federally Enforceable State Operating Permit (FESOP).

A.5 Prior Permit Conditions

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- (a) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits.
- (b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation permit, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued.

## SECTION B

## GENERAL CONDITIONS

### B.1 Permit No Defense [IC 13]

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.

### B.2 Definitions [326 IAC 2-8-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2, and 326 IAC 2-7) shall prevail.

### B.3 Permit Term [326 IAC 2-8-4(2)]

This permit is issued for a fixed term of five (5) years from the original date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

### B.4 Enforceability [326 IAC 2-8-6]

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

### B.5 Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-9.

### B.6 Severability [326 IAC 2-8-4(4)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

### B.7 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

This permit does not convey any property rights of any sort, or any exclusive privilege.

### B.8 Duty to Supplement and Provide Information [326 IAC 2-8-3(f)] [326 IAC 2-8-4(5)(E)] [326 IAC 2-8-5(a)(4)]

(a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit or,

for information claimed to be confidential, the Permittee may furnish such records directly to the U. S. EPA along with a claim of confidentiality.[326 IAC 2-8-4(5)(E)]

- (c) The Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1 When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

**B.9 Compliance Order Issuance [326 IAC 2-8-5(b)]**

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IDEM, OAQ, may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

**B.10 Compliance with Permit Conditions [326 IAC 2-8-4(5)(A)] [326 IAC 2-8-4(5)(B)]**

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- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit, except those specifically designated as not federally enforceable, is grounds for:
  - (1) Enforcement action;
  - (2) Permit termination, revocation and reissuance, or modification; and
  - (3) Denial of a permit renewal application.
- (b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
- (c) An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

**B.11 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]**

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- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by an authorized individual of truth, accuracy, and completeness. This certification, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.
- (c) An authorized individual is defined at 326 IAC 2-1.1-1(1).

**B.12 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]**

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- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than April 15 of each year to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015



- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
  - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
  - (2) The compliance status;
  - (3) Whether compliance was continuous or intermittent;
  - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
  - (5) Such other facts as specified in Sections D of this permit, IDEM, OAQ, may require to determine the compliance status of the source.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

B.13 Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each facility:
  - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
  - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
  - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

The PMP and the PMP extension notification do not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper

maintenance causes or contributes to any violation. The PMP does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (d) Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

**B.14 Emergency Provisions [326 IAC 2-8-12]**

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- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-8-12.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describes the following:
  - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
  - (2) The permitted facility was at the time being properly operated;
  - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
  - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone No.: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section) or,  
Telephone No.: 317-233-5674 (ask for Compliance Section)  
Facsimile No.: 317-233-5967

Northwest Regional Office  
NBD Bank Bldg.  
504 N. Broadway, Ste., 418  
Gary, IN 46402  
1-888-209-8892

Failure to notify IDEM, OAQ, and the Northwest Regional Office, by telephone or facsimile within four (4) daytime business hours after the beginning of the emergency, or after the emergency is discovered or reasonably should have been discovered, shall constitute a violation of 326 IAC 2-8 and any other applicable rules. [326 IAC 2-8-12(f)]

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
  - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
  - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
    - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
    - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

**B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]**

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- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provision), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report.

The notification by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:
- (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
  - (2) Failure to implement elements of the Preventive Maintenance Plan unless such failure has caused or contributed to a deviation.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

- (c) Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.

**B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination  
[326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]**

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- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a FESOP modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit [326 IAC 2-8-4(5)(C)]. The notification by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ, determines any of the following:
- (1) That this permit contains a material mistake.
  - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
  - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]
- (c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]

- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

**B.17 Permit Renewal [326 IAC 2-8-3(h)]**

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- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ, and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, IN 46206-6015

- (b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]

- (1) A timely renewal application is one that is:

- (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
- (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

- (2) If IDEM, OAQ, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.

- (c) Right to Operate After Application for Renewal [326 IAC 2-8-9]  
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as needed to process the application.

**B.18 Permit Amendment or Revision [326 IAC 2-8-10] [326 IAC 2-8-11.1]**

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- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

Any such application shall be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

**B.19 Operational Flexibility [326 IAC 2-8-15]**

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- (a) The Permittee may make any change or changes at this source that are described in 326 IAC 2-8-15(b) through (d), without prior permit revision, if each of the following conditions is met:

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any approval required by 326 IAC 2-8-11.1 has been obtained;
- (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V  
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-8-15(b) through (d) and makes such records available, upon reasonable request, to public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-8-15(b), (c)(1), and (d).

- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-8-15(a) and the following additional conditions:

- (1) A brief description of the change within the source;
- (2) The date on which the change will occur;
- (3) Any change in emissions; and

- (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

- (c) Emission Trades [326 IAC 2-8-15(c)]  
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).
- (d) Alternative Operating Scenarios [326 IAC 2-8-15(d)]  
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ or U.S. EPA is required.

B.20 Permit Revision Requirement [326 IAC 2-8-11.1]

A modification, construction, or reconstruction is governed by 326 IAC 2 and 326 IAC 2-8-11.1.

B.21 Inspection and Entry [326 IAC 2-8-5(a)(2)] [IC 13-14-2-2]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.22 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015

Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-11(b)(3)]

**B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16]**

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- (a) The Permittee shall pay annual fees to IDEM, and OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action, or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAQ, Technical Support and Modeling Section), to determine the appropriate permit fee.



## SECTION C SOURCE OPERATION CONDITIONS

Entire Source
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### Emissions Limitations and Standards [326 IAC 2-8-4(1)]

#### C.1 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

(a) Pursuant to 326 IAC 2-8:

- (1) The potential to emit nitrogen oxides (NO<sub>x</sub>) and volatile organic compounds (VOCs) from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period. This limitation shall also satisfy the requirements of 326 IAC 2-3 (Emission Offset);
- (2) The potential to emit PM<sub>10</sub>, PM, SO<sub>2</sub>, and CO from the entire source shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period;
- (3) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
- (4) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

(b) Pursuant to 326 IAC 2-3 (Emission Offset), emissions of particulate matter (PM) from the entire source shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period.

(c) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided the source's potential to emit does not exceed the above specified limits.

(d) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

#### C.2 Source Status

For this source to maintain its status as a separate source from Ispat Inland, the Permittee shall limit the amount of scrap iron and steel processed for Ispat Inland to no more than 80,000 tons per twelve (12) consecutive month period. Any increases in the amount of material processed for Ispat Inland requires prior approval from IDEM, OAQ. To document compliance with this limit, the Permittee shall maintain records of the amount of material processed each month for Ispat Inland.

#### C.3 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of twenty percent (20%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

**C.4 Open Burning [326 IAC 4-1] [IC 13-17-9]**

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The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3(a)(2)(A) and (B) are not federally enforceable.

**C.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]**

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The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and in 326 IAC 9-1-2. 326 IAC 9-1-2 is not federally enforceable.

**C.6 Fugitive Dust Emissions [326 IAC 6-4]**

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The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

**C.7 Fugitive Dust Emissions [326 IAC 6-1-11.1]**

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Pursuant to 326 IAC 6-1-11.1 (Lake County Fugitive Particulate Matter Control Requirements), the particulate matter emissions from source wide activities shall meet the following requirements:

- (a) The average instantaneous opacity of fugitive particulate emissions from a paved road shall not exceed ten percent (10%).
- (b) The average instantaneous opacity of fugitive particulate emissions from an unpaved road shall not exceed ten percent (10%).
- (c) The average instantaneous opacity of fugitive particulate emissions from batch transfer shall not exceed ten percent (10%).
- (d) The opacity of fugitive particulate emissions from continuous transfer of material onto and out of storage piles shall not exceed ten percent (10%) on a three (3) minute average.
- (e) The opacity of fugitive particulate emissions from storage piles shall not exceed ten percent (10%) on a six (6) minute average.
- (f) There shall be a zero (0) percent frequency of visible emission observations of a material during the inplant transportation of material by truck or rail at any time.
- (g) The opacity of fugitive particulate emissions from the inplant transportation of material by front end loaders and skip hoists shall not exceed ten percent (10%).
- (h) There shall be a zero (0) percent frequency of visible emission observations from a building enclosing all or part of the material processing equipment, except from a vent in the building.
- (i) The PM<sub>10</sub> emissions from building vents shall not exceed twenty-two thousandths (0.022) grains per dry standard cubic foot and ten percent (10%) opacity.
- (j) The opacity of particulate emissions from dust handling equipment shall not exceed ten percent (10%).

- (k) Any facility or operation not specified in 326 IAC 6-1-11.1(d) shall meet a twenty percent (20%), three (3) minute average opacity standard.

The Permittee shall achieve these limits by controlling fugitive particulate matter emissions according to the Fugitive Dust Control Plan, submitted to IDEM on June 13, 2001.

C.8 Operation of Equipment [326 IAC 2-8-5(a)(4)]

Except as otherwise provided by statute, rule or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

C.9 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
- (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
- (2) If there is a change in the following:
- (A) Asbestos removal or demolition start date;
- (B) Removal or demolition contractor; or
- (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management  
Asbestos Section, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

The notifications do not require a certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (e) Procedures for Asbestos Emission Control  
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

- (f) Indiana Accredited Asbestos Inspector  
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited, pursuant to the provisions of 40 CFR 61, Subpart M, is federally enforceable.

### **Testing Requirements [326 IAC 2-8-4(3)]**

#### **C.10 Performance Testing [326 IAC 3-6]**

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- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ, not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

### **Compliance Requirements [326 IAC 2-1.1-11]**

#### **C.11 Compliance Requirements [326 IAC 2-1.1-11]**

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The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

### **Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]**

#### **C.12 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]**

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Unless otherwise specified in this permit, all monitoring and record keeping requirements shall be implemented when operation begins. If required by Section D the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment.

#### **C.13 Maintenance of Emission Monitoring Equipment [326 IAC 2-8-4(3)(A)(iii)]**

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- (a) In the event that a breakdown of the emission monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in

Section D of this permit until such time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no often less than once an hour until such time as the continuous monitor is back in operation.

- (b) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.

**C.14 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]**

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Any monitoring or testing performed required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63 or other approved methods as specified in this permit.

**C.15 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)] [326 IAC 2-8-5(1)]**

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- (a) Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ( $\pm 2\%$ ) of full scale reading.
- (b) Whenever a condition in this permit requires the measurement of a temperature, the instrument employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ( $\pm 2\%$ ) of full scale reading.
- (c) The Permittee may request the IDEM, OAQ approve the use of a pressure gauge or other instrument that does not meet the above specifications provided the Permittee can demonstrate an alternative pressure gauge or other instrument specification will adequately ensure compliance with permit conditions requiring the measurement of pressure drop or other parameters.

**Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]**

**C.16 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]**

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Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

- (a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.

- (b) These ERPs shall be submitted for approval to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

within 180 days from the date on which this source commences operation.

The ERP does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) If the ERP is disapproved by IDEM, OAQ, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.
- (d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.

- (e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
- (f) Upon direct notification by IDEM, OAQ, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

**C.17 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68.215]**

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall submit:

- (a) A compliance schedule for meeting the requirements of 40 CFR 68; or
- (b) As a part of the annual compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP);

All documents submitted pursuant to this condition shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

**C.18 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5]**

- (a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. The compliance monitoring plan can be either an entirely new document, consist in whole of information contained in other documents, or consist of a combination of new information and information contained in other documents. If the compliance monitoring plan incorporates by reference information contained in other documents, the Permittee shall identify as part of the compliance monitoring plan the documents in which the information is found. The elements of the compliance monitoring plan are:
  - (1) This condition;
  - (2) The Compliance Determination Requirements in Section D of this permit;
  - (3) The Compliance Monitoring Requirements in Section D of this permit;
  - (4) The Record Keeping and Reporting Requirements in Section C (General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and
  - (5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAQ, upon request and shall be subject to review and approval by IDEM, OAQ. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of:
    - (A) Reasonable response steps that may be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and
    - (B) A time schedule for taking reasonable response steps including a schedule for devising additional response steps for situations that may not have been predicted.

- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to take reasonable response steps may constitute a violation of the permit.
- (c) Upon investigation of a compliance monitoring excursion, the Permittee is excused from taking further response steps for any of the following reasons:
  - (1) A false reading occurs due to the malfunction of the monitoring equipment. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.
  - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied.
  - (3) An automatic measurement was taken when the process was not operating.
  - (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- (e) All monitoring required in Section D shall be performed at all times the equipment is operating. If monitoring is required by Section D and the equipment is not operating, then the Permittee may record the fact that the equipment is not operating or perform the required monitoring.
- (f) At its discretion, IDEM may excuse the Permittee's failure to perform the monitoring and record keeping as required by Section D, if the Permittee provides adequate justification and documents that such failures do not exceed five percent (5%) of the operating time in any quarter. Temporary, unscheduled unavailability of qualified staff shall be considered a valid reason for failure to perform the monitoring or record keeping requirements in Section D.

C.19 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4]  
[326 IAC 2-8-5]

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- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition do not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

### **Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]**

#### **C.20 Emission Statement [326 IAC 2-6] [326 IAC 2-8-4(3)]**

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- (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6. This annual statement must be received by April 15 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8) (Emission Statement Operating Year). The annual statement must be submitted to:

Indiana Department of Environmental Management  
Technical Support and Modeling Section, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

The emission statement does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

#### **C.21 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]**

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- (a) Records of all required data, reports and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

#### **C.22 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]**

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- (a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:
- Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping



receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (e) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.

**C.23 Compliance with 40 CFR 82 and 326 IAC 22-1**

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Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair or disposal must comply with the required practices pursuant to 40 CFR 82.156
- (b) Equipment used during the maintenance, service, repair or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

## SECTION D.1

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-8-4(10)]:

- (a) One (1) diesel engine, identified as emission unit 3512, with a maximum capacity of 1019 HP and venting to stack SV001.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

THIS SECTION OF THE PERMIT IS BEING ISSUED UNDER THE PROVISIONS OF 326 IAC 2-1 AND 326 IAC 2-8-11.1, WITH CONDITIONS LISTED BELOW.

### Construction Conditions

#### General Construction Conditions

- D.1.1 This permit to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.
- D.1.2 Pursuant to IC 13-15-5-3, this section of this permit becomes effective upon its issuance.
- D.1.3 All requirements of these construction conditions shall remain in effect unless modified in a manner consistent with procedures established for revisions pursuant to 326 IAC 2.
- D.1.4 The attached affidavit of construction shall be submitted to the Office of Air Quality (OAQ), Permit Administration and Development Section, verifying that the emission units were constructed as proposed in the application.

### Operation Conditions

#### Emission Limitations and Standards [326 IAC 2-8-4(1)]

- D.1.5 Emission Offset Minor Limit [326 IAC 2-3] [40 CFR 52.21]  
The total input of diesel fuel to the diesel engine, unit 3512, shall be less than 82,595 gallons per 12 consecutive month period rolled monthly. This usage limit is required to limit the potential to emit of nitrogen oxides (NO<sub>x</sub>) to less than 25 tons per 12 consecutive month period. Compliance with this limit makes 326 IAC 2-3 (Emission Offset) not applicable.

#### Record Keeping and Reporting Requirements [326 IAC 2-5.1-3(e)(2)] [ 326 IAC 2-6.1-5(a)(2)]

- D.1.6 Record Keeping Requirements
- (a) To document compliance with Condition D.1.5, the Permittee shall maintain records of the monthly use of diesel fuel, in gallons.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.
- D.1.7 Reporting Requirements  
A quarterly summary of the information to document compliance with Condition D.1.5 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

## SECTION D.2

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-8-4(10)]:

- (b) One (1) steel and iron sizing and classifying process consisting of:
- (1) One (1) Hammer Mill with a maximum capacity of 75 tons per hour and venting to the atmosphere.
  - (2) One (1) iron and steel drop-balling process, with a maximum capacity of 112.5 tons per hour and venting to the atmosphere.
  - (3) One (1) Wash Screen with a maximum capacity of 75 tons per hour and venting to the atmosphere.
  - (4) Eight (8) conveyors with a maximum throughput of 112.5 tons per hour.
  - (5) Three (3) storage piles, identified as the feed storage pile, the non-magnetic material storage pile, and the magnetic material storage pile, each with a maximum capacity of 1000 tons and venting to the atmosphere.

### Insignificant Activities

- (b) Paved and unpaved roads and parking lots.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

THIS SECTION OF THE PERMIT IS BEING ISSUED UNDER THE PROVISIONS OF 326 IAC 2-1 AND 326 IAC 2-8-11.1, WITH CONDITIONS LISTED BELOW.

## Construction Conditions

### General Construction Conditions

- D.2.1 This permit to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.
- D.2.2 Pursuant to IC 13-15-5-3, this section of this permit becomes effective upon its issuance.
- D.2.3 All requirements of these construction conditions shall remain in effect unless modified in a manner consistent with procedures established for revisions pursuant to 326 IAC 2.
- D.2.4 The attached affidavit of construction shall be submitted to the Office of Air Quality (OAQ), Permit Administration and Development Section, verifying that the emission units were constructed as proposed in the application.

## Operation Conditions

### Emission Limitations and Standards [326 IAC 2-8-4(1)]

#### D.2.5 Fugitive Particulate Matter Limitations [326 IAC 6-1-11]

Pursuant to 326 IAC 6-1-11.1 (Lake County Fugitive Particulate Matter Control Requirements), the particulate matter emissions from the hammer mill, iron and steel drop-balling process, wash

screen, conveyors, storage piles and paved and unpaved roads, and parking lots shall be limited as follows:

- (a) The average instantaneous opacity of fugitive particulate emissions from batch transfer shall not exceed ten percent (10%).
- (b) The opacity of fugitive particulate emissions from continuous transfer of material into and out of storage piles shall not exceed ten percent (10%) on a three (3) minute average.
- (c) The opacity of fugitive particulate emissions from storage piles shall not exceed ten percent (10%) on a six (6) minute average.
- (d) There shall be a zero (0) percent frequency of visible emission observations of a material during the inplant transportation of material by truck or rail at any time.
- (e) The opacity of fugitive particulate emissions from the inplant transportation of material by front end loaders and skip hoists shall not exceed ten percent (10%).
- (f) There shall be a zero (0) percent frequency of visible emissions observed from a building enclosing all or part of the material processing equipment, except form a vent in the building.
- (g) The  $PM_{10}$  emissions from building vents shall not exceed twenty-two thousands (0.022) grains per dry standard cubic foot and ten percent (10%) opacity.
- (h) The average instantaneous opacity of fugitive particulate emissions from paved and unpaved roads shall not exceed ten percent (10%).
- (i) All other facilities and operations shall meet a twenty percent (20%), three (3) minute average opacity standard.

### **Compliance Determination Requirements**

#### **D.2.6 Fugitive Particulate Matter Compliance [326 IAC 6-1-11.1]**

---

- (a) Pursuant to 326 IAC 6-1-11.1 (Lake County Fugitive Particulate Matter Control Requirements), compliance with the limits specified in Condition D.2.5 shall be achieved by controlling fugitive particulate matter emissions according to the Fugitive Dust Control Plan (FDCP), submitted June 13, 2001 (Attachment A). If it is determined that the control procedures specified in the FDCP do not demonstrate compliance with the fugitive emission limitations, IDEM, OAQ may request that the FDCP be revised and submitted for approval.
- (b) Compliance with the opacity limitations listed in Conditions D.2.5 (a), (b), (c), (e), (h), and (i) shall be determined using 40 CFR 60, Appendix A, Method 9.
- (c) Compliance with the opacity limitation listed in Condition D.2.5 (d) shall be determined using 40 CFR 60, Appendix A, Method 22.
- (d) Compliance with the concentration standard in Condition D.2.5 (g) shall be determined using 40 CFR 60, Appendix A, Method 5 or 17. Compliance with the opacity standard in Condition D.2.5 (g) shall be determined using 40 CFR 60, Appendix A, Method 9.

## SECTION D.3

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-8-4(10)]: Insignificant Activities

- (a) Categories with emissions below insignificant thresholds: one diesel storage tanks, with a maximum capacity of 10,000 gallons.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

THIS SECTION OF THE PERMIT IS BEING ISSUED UNDER THE PROVISIONS OF 326 IAC 2-1 AND 326 IAC 2-8-11.1, WITH CONDITIONS LISTED BELOW.

### Construction Conditions

#### General Construction Conditions

- D.3.1 This permit to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.
- D.3.2 Pursuant to IC 13-15-5-3, this section of this permit becomes effective upon its issuance.
- D.3.3 All requirements of these construction conditions shall remain in effect unless modified in a manner consistent with procedures established for revisions pursuant to 326 IAC 2.
- D.3.4 The attached affidavit of construction shall be submitted to the Office of Air Quality (OAQ), Permit Administration and Development Section, verifying that the emission units were constructed as proposed in the application.

### Operation Conditions

#### Emission Limitations and Standards

##### D.3.5 Volatile Organic Liquid Storage Vessels [326 IAC 8-9]

The diesel tank has a capacity of less than 39,000 gallons. Therefore, pursuant to 326 IAC 8-9-1, the permittee is required to keep records on the information in 326 IAC 8-9-6(a)-(b).

#### Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

##### D.3.6 Record Keeping Requirements

Pursuant to 326 IAC 8-9, the permittee must keep records of the following:

- (a) The vessel identification number;
- (b) The vessel dimensions; and
- (c) The vessel capacity.

Records shall be maintained for the life of the vessel.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE DATA SECTION**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
CERTIFICATION**

**Source Name:** Fritz Enterprises, Inc.  
**Source Address:** 3210 Watling, East Chicago, Indiana, 46312  
**Mailing Address:** 1650 Jefferson, Trenton, MI 48183  
**FESOP No.:** F089-14058-00465

**This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.**

Please check what document is being certified:

- 9 Annual Compliance Certification Letter
- 9 Test Result (specify) \_\_\_\_\_
- 9 Report (specify) \_\_\_\_\_
- 9 Notification (specify) \_\_\_\_\_
- 9 Affidavit (specify) \_\_\_\_\_
- 9 Other (specify) \_\_\_\_\_

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE BRANCH  
P.O. Box 6015  
100 North Senate Avenue  
Indianapolis, Indiana 46206-6015  
Phone: 317-233-5674  
Fax: 317-233-5967**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
EMERGENCY OCCURRENCE REPORT**

**Source Name:** Fritz Enterprises, Inc.  
**Source Address:** 3210 Watling, East Chicago, Indiana, 46312  
**Mailing Address:** 1650 Jefferson, Trenton, MI 48183  
**FESOP No.:** F089-14058-00465

**This form consists of 2 pages**

**Page 1 of 2**

**9** This is an emergency as defined in 326 IAC 2-7-1(12)  
CThe Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and  
CThe Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:

Control Equipment:

Permit Condition or Operation Limitation in Permit:

Description of the Emergency:

Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A

**Page 2 of 2**

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency?    Y    N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO <sub>2</sub> , VOC, NO <sub>x</sub> , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: \_\_\_\_\_  
Title / Position: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

A certification is not required for this report.



**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE DATA SECTION**

**FESOP Quarterly Report**

**Source Name:** Fritz Enterprises, Inc.  
**Source Address:** 3210 Watling, East Chicago, Indiana, 46312  
**Mailing Address:** 1650 Jefferson, Trenton, MI 48183  
**FESOP No.:** F089-14058-00465  
**Facility:** Diesel Engine  
**Parameter:** Fuel use  
**Limit:** 82,595 gallons/12 consecutive month period

YEAR: \_\_\_\_\_

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.  
Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_  
Title / Position: \_\_\_\_\_  
Signature: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE DATA SECTION**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

**Source Name:** Fritz Enterprises, Inc.  
**Source Address:** 3210 Watling, East Chicago, Indiana, 46312  
**Mailing Address:** 1650 Jefferson, Trenton, MI 48183  
**FESOP No.:** F089-14058-00465

**Months:** \_\_\_\_\_ **to** \_\_\_\_\_ **Year:** \_\_\_\_\_

Page 1 of 2

This report is an affirmation that the source has met all the requirements stated in this permit. This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

**Permit Requirement** (specify permit condition #)

**Date of Deviation:**

**Duration of Deviation:**

**Number of Deviations:**

**Probable Cause of Deviation:**

**Response Steps Taken:**

**Permit Requirement** (specify permit condition #)

**Date of Deviation:**

**Duration of Deviation:**

**Number of Deviations:**

**Probable Cause of Deviation:**

**Response Steps Taken:**

<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	
<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	
<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	

Form Completed By: \_\_\_\_\_

Title/Position: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

**Attachment A**

**FRITZ ENTERPRISES**

ISPAT Inland Facility

**CONTROL PLAN FOR PARTICULATE EMISSIONS**

JUNE 2001

**FRITZ ENTERPRISES**  
ISPAT Inland Facility  
CONTROL PLAN FOR PARTICULATE EMISSIONS

**I. INTRODUCTION**

The following control plan is designed to reduce uncontrolled fugitive dust, based on a  $PM_{10}$  mass emission basis, from unpaved roadways (travel areas), material storage piles, processing operations, and material transfer activities.

This plan is in effect on a year-round basis to reduce uncontrolled fugitive dust. The site supervisor is responsible for implementing the control methods, as required, at the Fritz Enterprises yard.

**II. FACILITY INFORMATION**

Fritz Enterprises is moving its existing slag processing operation from the U.S. Steel Gary Works to the ISPAT Inland Steel facility in East Chicago, Indiana. The proposed site will cover approximately 3.9 acres within the existing ISPAT Inland facility. The following is the name and new mailing address of the facility:

Fritz Enterprises, Inc.  
3210 Watling Street  
East Chicago, IN 46312

Fritz is a privately held corporation. Mr. Raymond Fritz (Sr. Vice President), or his designee will provide direction and oversight regarding the execution of this control plan. All related correspondence should be mailed to Mr. Fritz at the following address:

Fritz Enterprises, Inc.  
1650 West Jefferson  
Trenton, MI 48183

Tele: (734) 362-3200  
FAX: (734) 362-3250

**III. PROCESS DESCRIPTION**

The Fritz process physically separates and sizes slag and iron and is classified as SIC 5093 (Scrap and Waste Materials). The primary pieces of equipment used in the process include: a hammer mill with a 1,019 HP diesel engine, (4) drop ball cranes, (3) front-end loaders, a wash screen, and (8) material conveyors.

The process begins as metal debris is delivered to the site and is evaluated and stacked in raw material storage piles according to size and preferred end use. Items larger than 2' x 2" are processed with crane drop-balling in order to reduce the size. Depending on the material size after drop balling, the material is either transferred to the product piles,

### **III. PROCESS DESCRIPTION (continued)**

or fed into the hammer mill for further processing. Material that is delivered at a size less than 2' x 2" is fed directly into the hammer mill from the material storage piles.

The hammer mill is a rotating cylinder that deforms and breaks-up the metal pieces. When metal is processed in this device, it is subjected to multiple impacts similar to crane drop balling, but at a much faster rate. This operation generates products in the optimum size for various uses in the steel making process (i.e. BOF, blast furnace, EAF, etc.) and allows for nearly 100% consumption. Following the hammer mill, material is processed at the wash screen and then transferred to the product piles (see the attached Process Flow Diagram).

Front-end loaders are utilized for material handling at the raw materials and product storage piles. Conveyors are utilized for in-process material transfers. The facility's total annual throughput is estimated at 180,000 tons of material processed.

### **IV. GENERAL FUGITIVE EMISSIONS SOURCES**

Visible emissions from any paved or unpaved area shall not exceed 10-percent opacity as averaged over any consecutive 6-minute period. All visible emission observations shall be determined in accordance with 326 IAC 6-1-11(d).

#### **Paved Roads and Parking Lots**

The roads leading to the Fritz yard are paved and maintained by ISPAT Inland Steel. Fugitive dust from paved roads and parking lots is controlled by flushing with water. Flushing is performed, on an as needed basis, to maintain fugitive particulate emissions below the acceptable opacity specified by 326 IAC 6-1-11, subsection (e)(3)(F).

#### **Unpaved Roads and Traffic Areas**

The Fritz yard is not paved and therefore requires the periodic use of a chemical dust suppressant to ensure that the average instantaneous opacity of fugitive particulate emissions does not exceed 10%, pursuant to 326 IAC 6-1-11, subsection (e)(8). As required, the area is treated with Penta Seal (an asphaltic emulsion) to control the particulate emissions associated with car and equipment traffic in the yard.

Treatment of unpaved areas is delayed when:

- 0.1 or more inches of rain have accumulated during the 24-hour period prior to the scheduled treatment, or
- Unpaved areas are saturated with water such that chemical dust suppressants cannot be accepted by the surface, or
- Unpaved areas are frozen or covered by ice, snow, or standing water, or
- The area is closed or abandoned, or
- It is raining at the time of the scheduled treatment.

## **V. SPECIFIC FUGITIVE EMISSION SOURCES**

The following is a list of the process operations that may result in the generation of particulate emissions:

- Material handling activities at the raw materials storage piles,
- Crane drop-balling to reduce material size,
- Hammer mill operations to reduce material size,
- Operation of the diesel engine to drive the hammer mill,
- Wash screen operations,
- Material transfer on the conveyors,
- Material handling activities at the product storage piles, and

Refer to the Air Quality permit application, submitted on March 7, 2001, for a more detailed description of the process emission sources and calculations of the potential facility emissions.

## **VI. CONTROL MEASURES**

The diesel drive for the hammer mill is not a significant source of fugitive particulate emissions. As such, the only applicable control measure will be to limit the unit operation to 1,600 hours per year. With regard to the remaining process operations, wet dust suppression will be used as the primary control measure. As required, Fritz personnel will implement wet dust suppression by using a water cannon at the material storage piles, drop-balling area, hammer mill, and wash screen.

The site supervisor will determine the applicability of control measures on a day-to-day basis, primarily dependent on weather conditions. As required, dust suppression will be implemented in the morning, prior to beginning process operations. Fritz personnel will also be instructed to remain aware of potential changes throughout the day (i.e. drying, wind) that may require application, or reapplication of dust suppression.

## **VII. SCHEDULE**

This Control Plan will go into effect on the first day of operation at the new Fritz facility. Any modification of this Control Plan, as warranted by process changes, will require submission to the controlling authority for approval prior to implementation.

# Indiana Department of Environmental Management Office of Air Quality

## Addendum to the Technical Support Document for Federally Enforceable State Operating Permit (FESOP) Renewal

### Source Background and Description

Source Name: Fritz Enterprises, Inc.  
Source Location: 3210 Watling, East Chicago, Indiana 46312  
County: Lake  
SIC Code: 5093  
Operation Permit No.: F089-14058-00465  
Permit Reviewer: ERG/AB

On July 2, 2001, the Office of Air Quality (OAQ) had a notice published in the Post Tribune in Merrillville, Indiana and The Times in Munster, Indiana stating that Fritz Enterprises, Inc. had applied for a Federally Enforceable State Operating Permit (FESOP) to operate an iron and steel recycling process with control. The notice also stated that OAQ proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

Upon further review, OAQ has decided to make the following revisions to the permit. Bolded language has been added and language with a line through it has been deleted.

Front Cover:

The source address has been corrected as follows:

Fritz Enterprises, Inc.  
3210 Watling, ~~Inc.~~  
East Chicago, Indiana 46312

Section D.2:

#### D.2.6 Fugitive Particulate Matter Compliance [326 IAC 6-1-11.1]

- 
- (a) Pursuant to 326 IAC 6-1-11.1 (Lake County Fugitive Particulate Matter Control Requirements), compliance with the limits specified in Condition D.2.5 shall be achieved by controlling fugitive particulate matter emissions according to the Fugitive Dust Control Plan (FDCP), submitted June 13, 2001 (Attachment A). If it is determined that the control procedures specified in the FDCP do not demonstrate compliance with the fugitive emission limitations, IDEM, OAQ may request that the FDCP be revised and submitted for approval.
  - (b) Compliance with the opacity limitations listed in Conditions ~~D.2.6 (b) and (c)~~, **D.2.5 (a), (b), (c), (d), (e), (h) and (i)** shall be determined using 40 CFR 60, Appendix A, Method 9.
  - (c) Compliance with the opacity limitation listed in Condition D.2.45(d) shall be determined using 40 CFR 60, Appendix A, Method 22.
  - (d) Compliance with the concentration standard in Condition D.2.5 (g) shall be determined using 40 CFR 60, Appendix A, Method 5 or 17. Compliance with the opacity standard in Condition D.2.5 (g) shall be determined using 40 CFR 60, Appendix A, Method 9.



## **Indiana Department of Environmental Management Office of Air Quality**

### **Technical Support Document (TSD) for a Federally Enforceable Operating Permit (FESOP)**

#### **Source Background and Description**

Source Name: Fritz Enterprises, Inc.  
Source Location: 3210 Watling, East Chicago, Indiana, 46312  
County: Lake  
SIC Code: 5093  
Operation Permit No.: F089-14058-00465  
Permit Reviewer: ERG/AB

The Office of Air Quality (OAQ) has reviewed a FESOP application from Fritz Enterprises, Inc. relating to the operation of an iron and steel recycling process.

#### **Source Definition**

IDEM has determined that Ispat Inland Inc. and Fritz Enterprises, Inc. are two separate sources. Although these sources are located on contiguous properties, they have different owners and operate under different SIC codes. Fritz will be processing iron and steel spills from Ispat, and recycling the usable materials back to the steel mill. However, according to their contract with Ispat, Fritz will process a maximum of 80,000 tons per year of material from Ispat. Fritz's limited capacity will be 180,000 tons per year, and therefore, less than forty-five percent of their capacity will be dedicated to Ispat. As a result, there is no support relationship between Fritz and Ispat and they are considered separate sources.

#### **New Emission Units and Pollution Control Equipment**

The source consists of the following new emission units and pollution control devices:

- (a) One (1) diesel engine, identified as emission unit 3512, with a maximum capacity of 1019 HP and venting to stack SV001.
- (b) One (1) steel and iron sizing and classifying process consisting of:
  - (1) One (1) Hammer Mill with a maximum capacity of 75 tons per hour and venting to the atmosphere.
  - (2) One (1) iron and steel drop-balling process, with a maximum capacity of 112.5 tons per hour and venting to the atmosphere.
  - (3) One (1) Wash Screen with a maximum capacity of 75 tons per hour and venting to the atmosphere.
  - (4) Eight (8) conveyors with a maximum throughput of 112.5 tons per hour.

- (5) Three (3) storage piles, identified as the feed storage pile, the non-magnetic material storage pile, and the magnetic material storage pile, each with a maximum capacity of 1000 tons and venting to the atmosphere.

### Unpermitted Emission Units and Pollution Control Equipment

There are no permitted or unpermitted facilities operating at this source during this review process.

### Insignificant Activities

This source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21).

- (a) Categories with emissions below insignificant thresholds: one diesel storage tank, with a maximum capacity of 10,000 gallons.
- (b) Paved and unpaved roads and parking lots.

### Enforcement Issue

There are no enforcement actions pending.

### Recommendation

The staff recommends to the Commissioner that the FESOP be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete FESOP application for the purposes of this review was received on March 12, 2001. Additional information was received on April 24, 2001.

### Emission Calculations

See Appendix A, pages 1 through 5, of this document for detailed emissions calculations.

### Potential To Emit for the Source

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA."

This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	292.63
PM-10	39.16
SO <sub>2</sub>	7.2
VOC	2.9
CO	24.5
NO <sub>x</sub>	120.5

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP's	Potential To Emit (tons/year)
Single	0
TOTAL	0

- (a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of NO<sub>x</sub> is equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) Pursuant to 326 IAC 2-8, this source, otherwise required to obtain a Title V permit, has agreed to accept a permit with federally enforceable limits that restrict PTE to below Title V emission levels. Therefore, this source will be issued a Federally Enforceable State Operating Permit (FESOP). A fuel limit for the diesel engine will limit NO<sub>x</sub> emissions to less than 25 tpy. Therefore, the Title V and Emission Offset requirements are not applicable.
- (c) This type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2.
- (d) Fugitive Emissions  
 Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD and Emission Offset applicability.

### Limited Potential to Emit

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this Federally Enforceable State Operating Permit.

	Potential to Emit (tons/year)						
Process/facility	PM	PM-10	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	HAPs
Diesel Engine*	0.6	0.6	1.4	0.6	4.9	<25	0
Fugitive Sources**	289.5	36.1	0	0.002	0	0	0
Total Emissions	290.1	36.7	1.4	0.6	4.9	<25	0

\* These emissions from the diesel engine reflect a limit on the total fuel usage. This limit on fuel usage will limit the emissions of NO<sub>x</sub> to 25 tons per year, therefore, making 326 IAC 2-3 (Emission Offset) and 326 IAC 2-7 (Title V) not applicable.

\*\* Fugitive sources include: hammer mill, drop ball process, end loaders, storage piles, diesel storage tank and unpaved roads.

### County Attainment Status

The source is located in Lake County.

Pollutant	Status
PM-10	Moderate nonattainment
SO <sub>2</sub>	Primary nonattainment
NO <sub>2</sub>	attainment
Ozone	Severe nonattainment

Pollutant	Status
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) and oxides of nitrogen (NO<sub>x</sub>) are precursors for the formation of ozone. Therefore, VOC and NO<sub>x</sub> emissions are considered when evaluating the rule applicability relating to the ozone standards. Lake County has been designated as nonattainment for ozone. Therefore, VOC and NO<sub>x</sub> emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3.
- (b) Lake County has been classified as nonattainment for PM and SO<sub>2</sub>. Therefore, these emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3.
- (c) Fugitive Emissions  
Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD and Emission Offset applicability.

#### **Federal Rule Applicability**

- (a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source. 40 CFR 60, Subpart LL (Standards of Performance for Metallic Mineral Processing Plants) does not apply to this source because this source does not meet the definition of a metallic mineral processing plant. A metallic mineral processing plant produces metallic minerals concentrates from ore. Fritz recycles iron and steel that has already been through a steel mill. Subpart Kb (Standards of Performance for Volatile Organic Liquid Storage Vessels) does not apply because the capacity of the diesel tank is less than 40 cubic meters.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) applicable to this source.

#### **State Rule Applicability - Entire Source**

##### **326 IAC 2-3 (Emission Offset) and 326 IAC 2-8 (FESOP)**

The total input of diesel fuel to the diesel engine, unit 3512, shall be less than 82,595 gallons per 12 consecutive month period rolled monthly. This usage limit is required to limit the potential to emit of nitrogen oxides (NO<sub>x</sub>) to less than 25 tons per 12 consecutive month period. Compliance with this limit makes 326 IAC 2-3 (Emission Offset) not applicable.

Compliance with this limit also makes the requirements of 326 IAC 2-7 not applicable since for Part 70 applicability NO<sub>x</sub> emissions have to be greater than 100 tons per year. Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 and since there are no applicable new source performance standards that were in effect on August 7, 1990, fugitive emissions were not counted toward determinations of emission offset applicability. Therefore, no limits on PM or PM10 are necessary.

##### **326 IAC 1-2-73 (Source Definition)**

For this source to maintain its status as a separate source from Ispat Inland, the Permittee shall limit the amount of scrap iron and steel processed for Ispat Inland to no more than 80,000 tons per twelve (12) consecutive month period. Any increases in the amount of material processed for Ispat Inland requires prior approval from IDEM, OAQ. To document compliance with this limit, the Permittee shall maintain records of the amount of material processed each month for Ispat Inland.

**326 IAC 2-6 (Emission Reporting)**

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than ten (10) tons per year of NO<sub>x</sub>. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by April 15 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

**326 IAC 5-1 (Visible Opacity Limitations)**

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of twenty percent (20%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

**State Rule Applicability - Individual Facilities**

**326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))**

The operation of all facilities in this recycling operation will emit less than 10 tons per year of a single HAP or 25 tons per year of a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

**326 IAC 6-1-2(g) (Nonattainment Area PM Limitations for Mineral Aggregate Operations)**

The requirements of 326 IAC 6-1-2(g) do not apply to this source, because this source does not perform mineral aggregate operations.

**326 IAC 6-1-2(a) (Nonattainment Area PM Limitations for General Sources)**

The requirements of 326 IAC 6-1-2 (a) do not apply to this source, because the steel and iron sizing and classifying processes result in fugitive emissions only.

**326 IAC 6-1-11.1 (Fugitive Particulate Matter Limitations)**

Pursuant to 326 IAC 6-1-11.1 (Lake County Fugitive Particulate Matter Control Requirements), the particulate matter emissions from the hammer mill, iron and steel drop-balling process, wash screen, conveyors, storage piles and paved and unpaved roads and parking lots shall be limited as follows:

- (a) The average instantaneous opacity of fugitive particulate emissions for batch transfer shall not exceed ten percent (10%).
- (b) The opacity of fugitive particulate emissions from continuous transfer of material into and out of storage piles shall not exceed ten percent (10%) on a three (3) minute average.
- (c) The opacity of fugitive particulate emissions from storage piles shall not exceed ten percent (10%) on a six (6) minute average.
- (d) There shall be a zero (0) percent frequency of visible emission observations of a material during the inplant transportation of material by truck or rail at any time.
- (e) The opacity of fugitive particulate emissions from the inplant transportation of material by front end loaders and ship hoists shall not exceed ten percent (10%).

- (f) There shall be a zero (0) percent frequency of visible emissions observed from a building enclosing all or part of the material processing equipment, except from a vent in the building.
- (g) The  $PM_{10}$  emissions from building vents shall not exceed twenty-two thousandths (0.022) grains per dry standard cubic foot and ten percent (10%) opacity.
- (h) The average instantaneous opacity of fugitive particulate emissions from paved and unpaved roads and parking lots shall not exceed ten percent (10%).
- (i) All other facilities and operations shall meet a twenty percent (20%), three (3) minute average opacity standard.

The Permittee shall achieve these limits by controlling fugitive particulate matter emissions according to the approved Fugitive Dust Control Plan. A copy of this plan is included in the permit as Attachment A.

#### 326 IAC 8-9 (Volatile Organic Liquid Storage Vessels)

The diesel tank has a capacity of less than 39,000 gallons. Therefore, pursuant to 326 IAC 8-9-1, the permittee is required to keep records on the information in 326 IAC 8-9-6(a)-(b).

Pursuant to 326 IAC 8-9, the permittee must keep records of the following:

- (a) The vessel identification number;
- (b) The vessel dimensions; and
- (c) The vessel capacity.

Records shall be maintained for the life of the vessel.

### Testing Requirements

Testing is not required for this source because the principal sources of PM, which is the major pollutant, are fugitive sources. Limits on the emissions from the diesel engine will be accomplished through a fuel limit, which can be verified through record keeping requirements. Therefore, testing is not necessary for this source.

### Compliance Requirements

Permits issued under 326 IAC 2-8 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-8-4. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

There are no compliance monitoring requirements applicable to this source.

### **Conclusion**

The operation of this iron and steel recycling process shall be subject to the conditions of the attached proposed (FESOP No.: F089-14058-00465).

**Appendix A: Emission Calculations**  
**Large Internal Combustion Engines - Diesel Fuel**  
**Engine (>600 HP)**

**Company Name:** Frtiz Enterprises, Inc  
**Address City IN Zip:** 3210 Watling, East Chicago, IN 46312  
**CP#:** 089-14058  
**Plt ID:** 089-00465  
**Reviewer:** ERG/KH  
**Date:** 04/13/2001

**Emissions calculated based on output rating (hp)**

Heat Input Capacity                      Potential Throughput                      S=  = WEIGHT % SULFUR  
Horsepower (hp)                              hp-hr/yr

                    

Emission Factor in lb/hp-hr	Pollutant					
	PM*	PM10*	SO2	NOx*	VOC	CO
	0.0007	0.0007	0.002 (8.09E-3S)	0.027	0.001	5.5E-03
Potential Emission in tons/yr	3.1	3.1	7.2	120.5	2.9	24.5

\*NOx emission factor provided by the source based on testing results  
Note that the PM10 emission factor in lb/hp-hr is not provided in the Supplement B update of AP-42.  
An average conversion factor of 1hp-hr = 7,000Btu is provided below.

**Limited Emissions calculated based on output rating (hp)**

Heat Input Capacity                      Limited Potential Throughput                      S=  = WEIGHT % SULFUR  
Horsepower (hp)                              hp-hr/yr

                    

Emission Factor in lb/hp-hr	Pollutant					
	PM*	PM10*	SO2	NOx*	VOC	CO
	0.0007	0.0007	0.002 (8.09E-3S)	0.027	0.001	5.5E-03
Potential Emission in tons/yr	0.6	0.6	1.4	24.0	0.6	4.9

\*NOx emission factor provided by the source based on testing results  
Note that the PM10 emission factor in lb/hp-hr is not provided in the Supplement B update of AP-42.  
An average conversion factor of 1hp-hr = 7,000Btu is provided below.

**Methodology**

Potential Throughput (hp-hr/yr) = hp \* 8760 hr/yr

Emission Factors are from AP 42 (Supplement B 10/96)Table 3.4-1 and Table 3.4-2

1 hp-hr = 7000 Btu, AP42 (Supplement B 10/96), Table 3.3-1, Footnote a.

Emission (tons/yr) = [Heat input rate (MMBtu/hr) x Emission Factor (lb/MMBtu)] \* 8760 hr/yr / (2,000 lb/ton )

Emission (tons/yr) = [Potential Throughput (hp-hr/yr) x Emission Factor (lb/hp-hr)] / (2,000 lb/ton )

\*No information was given regarding which method was used to determine the PM emission factor or whether condensable PM is included. The PM10 emission factor is filterable and condensable PM10 combined.

Note: Check the applicable rules and test methods for PM and PM10 when using the above emission factors to confirm that the correct factor is used (i.e., condensable included/not included).



**Appendix A: Emission Calculations**  
**Internal Combustion Engines - Diesel Fuel**  
**Calculation of PSD Minor Limit**

Page 2 of 5 TSD App A

**Company Name:** Frtiz Enterprises, Inc  
**Address City IN Zip:** 3210 Watling, East Chicago, IN 46312  
**CP#:** 089-14058  
**Plt ID:** 089-00465  
**Reviewer:** ERG/KH  
**Date:** 04/13/2001

Emission Limit: 24 tons NOx  
Number of Units: 1

Calculate the limit on fuel usage necessary to ensure that NOx emissions are under 25 tons.

$\text{Emissions (tpy)} = \text{Power Output (HP)} * \text{Emission Factor (lb/HP-hr)} * 8760 \text{ hrs/yr} / 2000 \text{ lb/ton}$

$\text{Emissions (tpy)} = \text{Fuel Usage (gal/hr)} * \text{Fuel Heating Value (BTU/gal)} / 6555 \text{ BTU/HP-hr} * \text{Emission Factor (lb/HP-hr)} * 8760 \text{ hrs/yr} / 2000 \text{ lb/ton}$

$\text{Fuel Usage (gal/hr)} = \text{Emissions (tpy)} * 2000 \text{ lb/ton} * 6555 \text{ BTU/HP-hr} / (\text{Fuel Heating Value (BTU/gal)} * \text{Emission Factor (lb/HP-hr)} * 8760 \text{ hrs/yr})$

$\text{Fuel Usage (gal/hr)} = 24 \text{ tpy} * 2000 * 6555 / (137,030 * 0.027 * 8760)$

Fuel Usage (gal/hr) = 9.428647

Fuel Usage (gal/yr) = 82594.95                      226.2875 gal/day

**Total Limited Fuel Usage (gal/yr) = 82,595**

$\text{Equivalent Limited Hours of Operation} = \text{Emissions (tpy)} * 2000 \text{ lb/ton} / (\text{Power Output (HP)} * \text{Emission Factor (lb/HP-hr)})$

**Equivalent Limited Hours of Operation = 1745**

**Appendix A: Emission Calculations  
PM Sources**

**Company Name: Frtiz Enterprises, Inc**  
**Address City IN Zip: 3210 Watling, East Chicago, IN 46312**  
**CP#: 089-14058**  
**Plt ID: 089-00465**  
**Reviewer: ERG/KH**  
**Date: 04/13/2001**

Facility	Maximum Throughput (tpy)	PM Emission Factor (lb/ton)	PM-10 Emission Factor (lb/ton)	PM Emission (tpy)	PM-10 Emissions (tpy)
Hammer Mill/Drop Ball Cranes*	985,500	0.5	0.05	246.375	24.6375
End loaders**	985,500	0.0088	0.0043	4.34	2.12
Storage Pile - dropping material***	985,500	0.004	0.004	1.93	1.93
Storage Pile - wind erosion	NA	NA	NA	0.24	0.24
<b>TOTAL</b>				<b>252.88</b>	<b>28.92</b>

\* Iron and steel is processed by either the hammer mill or the drop ball cranes. The emission factors are from AP-42, table 11.24-2 from Emission Factors for Metallic Minerals Processing. The emission factors include hopper ore dump, screening, crushing, surge bin, apron feeder, and conveyor belt transfer points.

\*\* The emission factors are from AP-42, table 12.5-4 from Uncontrolled Particulate Emission Factors for Open Dust at Iron and Steel Mills.

\*\*\* Emissions from Storage Piles are detailed below.

**Particulate Emissions from dropping material on storage piles:**

Emission factor E (lb/ton) =  $K * 0.0032 * (U / 5)^{1.3} / (M / 2)^{1.4}$  equation from AP-42, p. 13.2.4-3  
 $k = 0.74$   
 $U = 8.15 \text{ MPH}$   
 $M = 2.2\%$  from AP-42, table 13.2.4-1

$E = 0.74 * 0.0032 * (8.15 / 5)^{1.3} / (2.2 / 2)^{1.4}$   
E (lb/ton) = 0.004

PM Emissions = 985,500 ton/yr \* 0.004 lb/ton / 2000 lb/ton  
PM Emission (tpy) = 1.927

**Emissions due to Wind Erosion**

Emission factor E (lb/day/acre) =  $1.7 * (s / 1.5) ** ((365-p) / 235) * (f / 15)$  equation from Air Pollution Manual by A. Buonicore and W. Davis, Chapter 4, Eq. 5  
 $s = 5.3\%$  from AP-42, table 13.2.4-1  
 $p = 116$   
 $f = 21\%$

$E = 1.7 * (5.3 / 1.5) * ((365-116) / 235) * (21/15)$   
E (lb/day/acre) = 8.91

PM Emissions = 8.91 lb/day/acre \* (6400 sq ft / 43560 sq ft/acre) \* 365 days/yr / 2000 lb/ton  
PM Emission (tpy) = 0.24

**Appendix A: Emission Calculations**  
**PM, PM-10 Emissions from Unpaved Roads**

**Company Name: Frtiz Enterprises, Inc**  
**Address City IN Zip: 3210 Watling, East Chicago, IN 46312**  
**CP#: 089-14058**  
**Plt ID: 089-00465**  
**Permit Reviewer: ERG/KH**  
**Date: 04/13/2001**

Maximum distance driven by all vehicles in one complete loop (ft):	1000
Number of trips per year:	25714.29

Maximum vehicle miles traveled per year (VMT):	4870
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% of VMT made by small vehicles:	0.00
Maximum gross vehicle weight of small vehicles (tons):	110

% of VMT made by medium vehicles:	0.00
Maximum gross vehicle weight of medium vehicles (tons):	60

% of VMT made by large vehicles:	1.00
Maximum gross vehicle weight of large vehicles (tons):	54

Mean gross vehicle weight (tons)	54
----------------------------------	----

Surface material silt content (%)	5.3	
Surface material moisture content under worst-case dry conditions:	0.2	0.2=DEFAULT
Number of days with at least 0.254 mm of precipitation:	116	

PM-30 Emission Factor (lbs/VMT):	15.05284
<b>PM-30 Emissions (tons/yr):</b>	<b>36.65464</b>

PM-10 Emission Factor (lbs/VMT):	2.931329
<b>PM-10 Emissions (tons/yr):</b>	<b>7.137976</b>

**Methodology:**

source: AP-42, chapter 13.2.2 (equation (2))

PM Emission Factor =  $k \cdot (s/12)^a \cdot (W/3)^b \cdot (M_{dry}/0.2)^c \cdot [(365-p)/365]$

where: k, a, b, and c are empirical constants

s = surface material silt content (%)

W = mean vehicle weight (tons)

M<sub>dry</sub> = surface material moisture content under dry, uncontrolled conditions (%)

p = number of days with at least 0.254 mm (0.01 in) of precipitation per year

and:

constant	PM-30	PM-10
k	10	2.6
a	0.8	0.8
b	0.5	0.4
c	0.4	0.3

**Appendix A: Emissions Calculations**  
**VOC emissions from Additive Tanks**

**Company Name:** Frtiz Enterprises, Inc  
**Address City IN Zip:** 3210 Watling, East Chicago, IN 46312  
**CP:** 089-14058  
**Plt ID:** 089-00465  
**Reviewer:** ERG/KH  
**Date:** 04/13/2001

Tank ID	Size (gal)	Content	Potential Throughput (gal/yr)	Potential Turnovers	Potential VOC emissions (lb/yr)*	Potential VOC emissions (tpy)
1	10000	diesel fuel	80,000	0	4.39	0.002
<b>TOTAL</b>					<b>4.39</b>	<b>0.002</b>

\* Potential VOC emissions were calculated using TANKS 4.0